




January 31, 2024

**VIA ECF**

Hon. Jennifer H. Rearden  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Application GRANTED. The Clerk of Court is directed to terminate ECF No. 99 and maintain ECF Nos. 100 and 101 under seal. SO ORDERED.

  
Jennifer H. Rearden, U.S.D.J.  
Dated: February 7, 2024

Re: Chanel, Inc. v. Lin, et al. 23 CV 2004 (JHR)

Dear Judge Rearden:

Pursuant to the Court's January 16, 2024 Order (Dkt. 97) and Rule 9 of Your Honor's Individual Practices in Civil Cases, Plaintiff Chanel, Inc. respectfully requests leave to file two (2) Confidential Settlement Agreements in their entirety under seal. The Settlement Agreements are between Plaintiff and eight (8) of the eleven (11) defendants (six (6) are represented by counsel and two (2) have appeared Pro Se). There are three (3) remaining defendants who have not appeared and with whom Plaintiff has not entered into any settlement.

Pursuant to Rule 9 of Your Honor's Individual Practices in Civil Cases, counsel for Plaintiff Chanel and the appearing parties have met and conferred and have no objection to Plaintiff's request. Plaintiff's counsel has notified the Pro Se defendants in writing of their request to move the Court to file the Settlement Agreements under seal, and have received no response or objection.

The Settlement Agreements contain proprietary information as well as sensitive identifying and financial information of both Plaintiff and Defendants. If their terms become subject to view by the remaining defendants in this case, it may unfairly prejudice Plaintiff's ability to effectively litigate or seek an amicable resolution of this dispute with the remaining defendants.

We thank the Court for its consideration of this matter.

Respectfully Submitted,

Gibney Anthony & Flaherty LLP  
Counsel for Plaintiff Chanel, Inc.

By: /s/ John Macaluso  
John Macaluso

cc: All counsel of record (Via ECF)